

Exhibit A

Shirley Gibson

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MONTANA
3 BILLINGS DIVISION
4 TRACY CAEKAERT, and
5 CAMILLIA MAPLEY,
6 Plaintiffs, Case No. CV-20-52-BLG-SPW
7 vs.
8 WATCHTOWER BIBLE AND TRACT
9 SOCIETY OF NEW YORK, INC.,
10 WATCH TOWER BIBLE AND
11 TRACT SOCIETY OF
12 PENNSYLVANIA, and BRUCE
13 MAPLEY SR.,
14 Defendants.
15 WATCHTOWER BIBLE AND TRACT
16 SOCIETY OF NEW YORK, INC.,
17 Cross Claimant,
18 BRUCE MAPLEY, SR.,
19 Cross Defendant.
20 _____
21 ARIANE ROWLAND, and JAMIE
22 SCHULZE Cause No. CV 20-59-BLG-SPW
23 Plaintiff,
24 vs.
25 WATCHTOWER BIBLE AND TRACT

Shirley Gibson

1 SOCIETY OF NEW YORK, INC.
2 and WATCH TOWER BIBLE AND
3 TRACT SOCIETY OF
4 PENNSYLVANIA,
5 Defendants.

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9 VIDEOCONFERENCE/VIDEOTAPED DEPOSITION
10 UPON ORAL EXAMINATION OF
11 SHIRLEY GIBSON
12

13 BE IT REMEMBERED, that the
14 videoconference/videotaped deposition upon oral
15 examination of Shirley Gibson, appearing at the
16 instance of the Plaintiffs, was taken at 800 North
17 Last Chance Gulch, Suite 101, Helena, Montana, on
18 Thursday, April 14, 2022, beginning at the hour of
19 9:07 a.m., pursuant to the Federal Rules of Civil
20 Procedure, before Mary R. Sullivan, Registered
21 Merit Reporter, Certified Realtime Reporter, and
22 Notary Public.
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1 A. He was going to handle it.

2 Q. Okay. So he didn't say he was going to
3 tell the authorities.

4 A. No, but I thought that's what he would
5 do.

6 Q. I see. And if he had done -- Let's say
7 he -- Let's say he told you not to, did you
8 understand you could go to the authorities if you
9 wanted to?

10 A. Yeah. He didn't tell me I couldn't, but
11 I assumed he was going to take care of it.

12 Q. Okay.

13 A. And I should have done it.

14 Q. When did you -- When did you follow up
15 with him on that?

16 A. I never had any contact with -- I mean, I
17 never had any more conversations with him or
18 anybody else about it after that.

19 Q. Okay. Did other people in the
20 congregation know that Gunner had molested Tracy
21 and Ronda?

22 A. Yes.

23 Q. How did they find out about it?

24 A. Same way I did, I guess. I never asked
25 them.

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1 Q. Okay. Who -- Can you identify other
2 people who knew about it by name?

3 A. Martin Svenson, James Rowland,
4 Joyce Hains, June Rimby. All deceased now.

5 Q. Mm-hmm. Anyone else that you know that
6 knew about it?

7 A. No.

8 Q. Were you permitted to tell people about
9 it?

10 A. I could have, but I didn't.

11 Q. Okay. So you understood that you could,
12 you could have gone to the authorities or you
13 could have told people about it, but you didn't.

14 A. Yes.

15 Q. You chose not to.

16 A. I chose not to.

17 Q. Okay.

18 A. It was a mistake.

19 Q. Sorry?

20 A. Was a mistake.

21 Q. Okay. And had you ever been taught as a
22 member of the church that the elders direct how to
23 handle situations like wrongdoing within the
24 congregation?

25 A. Yes.

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1 Q. And is that because -- Was Tracy there
2 when Gunner molested Ronda?

3 A. I'm assuming. I -- I don't know.

4 Q. Okay. Okay. But so you learned that
5 from Tracy.

6 A. Yes.

7 Q. Okay. So going back here, you're talking
8 about you're in the home, Bruce sits the family
9 down, he asks Tracy to tell the family what
10 happened to her at Gunner's house, is that right,
11 essentially?

12 A. Yes. And then he admitted he did it
13 to -- and he was sorry, he'd never do it again.
14 Back in those days we didn't know about all
15 this -- terrible things, so we assumed when
16 somebody says you're sorry and they're not going
17 to do it again, they don't, but that was wrong,
18 too.

19 Q. And so in 1977 in your home when Bruce
20 has Tracy tell the family what Gunner had done to
21 her, in that same conversation, he told your
22 family, that would be you, Tracy, Camie, and
23 Bruce, Jr., right?

24 A. Yes.

25 Q. That -- That he had been molesting Tracy

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1 as well.

2 A. Yes.

3 Q. Was Tracy upset during that? Was she
4 crying or?

5 A. Course she was.

6 Q. She was?

7 A. Yes.

8 Q. How about Camie?

9 A. Camie never said much.

10 Q. Okay. What did Bruce say he'd been doing
11 to Tracy?

12 A. You know, he never did say. He just said
13 he molested her, so I used my imagination.

14 Q. Okay.

15 MR. SWEENEY: Mind if we take a break?

16 MR. SHAFFER: Yeah, that's fine.

17 MR. SWEENEY: Thank you.

18 THE VIDEOGRAPHER: Let's go off the
19 record. It's 10:23.

20 (Recess taken from 10:23 a.m. to
21 10:36 a.m.)

22 THE VIDEOGRAPHER: We're back on the
23 record. It's 10:36.

24 BY MR. SHAFFER:

25 Q. Ms. Mapley, I should have mentioned